

**EXHIBIT 1**IN THE CIRCUIT COURT OF ST LOUIS COUNTY  
STATE OF MISSOURI

TERESA WOODS & )  
KENNETH SLOAN )  
Plaintiff, )  
vs. )  
RED ROOF INNS, INC )      **JURY TRIAL DEMANDED**  
Defendant. )  
Serve Registered Agent: )  
CSC-LAWYERS INC. )  
221 BOLIVAR STREET )  
JEFFERSON CITY, MO 65101 )

**PETITION**

COME NOW Plaintiffs, TERESA WOODS & KENNETH SLOAN, by and through the undersigned, and for their Petition against Defendant, RED ROOF INNS, INC states as follows:

1.     Defendant owns/operates a hotel identified on its website as RED ROOF INN ST LOUIS – FLORRISANT located at 307 DUNN RD FLORRISNAT MO 63033 and Defendant is organized under the laws of the State of Missouri and doing business in the State of Missouri. At all times relevant herein, Defendant acted by and through its agents and employees.
2.     The cause of action that is the subject of this Petition arose in St Louis County, Missouri.
3.     The amount in controversy exceeds \$25,000, exclusive of interest and costs.
4.     Venue is appropriate in St Louis County, State of Missouri.
5.     Before and including July 5, 2020 Plaintiffs were business invitees of RED ROOF

INN INC (hereinafter RED ROOF) at its Florissant MO location.

6. Plaintiffs paid for and rented a room at RED ROOF in Florissant, MO.

7. In the early morning hours of July 5, 2020, an individual named Clarence Wigfall, entered the premises and requested the RED ROOF employees identify the room Plaintiffs were staying, provide him with a key to access the room, and to not inform the Plaintiffs.

8. RED ROOF employees provided Clarence Wigfall with the room number, the room key, and did not request permission from or inform Plaintiffs.

9. Clarence Wigfall proceeded to and entered the Plaintiffs' room using the key provided to him by RED ROOF and violently assaulting both of the Plaintiffs.

10. Defendant owed Plaintiffs a reasonable degree of care in maintaining their privacy, safety, and security of the premises while under its control and to warn of any dangerous conditions.

11. Defendant breached the duty it owed Plaintiff in the following respects:

- A) Defendant negligently disclosed Plaintiffs' information & room number;
- B) Defendant negligently provided WIGFALL a room key to Plaintiffs' room;
- C) Defendant knew or should have known WIGFALL was not a registered guest;
- D) Defendant did not attempt to or request permission from either Plaintiff to disclose private information;
- E) Defendant did not attempt to or request permission from either Plaintiff to provide WIGFALL with a room key;

12. It is foreseeable that providing location information and access to a guest's room, without their knowledge or permission, to a 3<sup>rd</sup> party can result in damage to property or persons.

13. As a direct and proximate result of Defendant's negligence, Plaintiffs were caused to suffer injuries, the plaintiffs haves sustained the following:

- a. past and future pain and suffering and loss of enjoyment of life;
- b. lost wages;
- c. past medical expenses;
- c. future medical expenses.

WHEREFORE, Plaintiffs requests this Court to enter judgment in their favor and against the Defendant, and award them compensatory damages in an amount to be proven at trial to be fair and reasonable in excess of \$25,000; to award them prejudgment interest and the costs of this action, and to grant such other relief as the Court may deem necessary and proper.



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Attorneys for Plaintiff



## IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: JOHN N. BORBONUS III	Case Number: 20SL-CC04298	<b>RECEIVED</b> <b>AUG 28 2020</b> <b>COLE COUNTY</b> <b>SHERIFF'S OFFICE</b> <b>FILED</b> <small>(Date File Stamp)</small>
Plaintiff/Petitioner: TERESA WOODS  vs.	Plaintiff's/Petitioner's Attorney/Address BENJAMIN JOSEPH SANSONE SANSONE/LAUBER SUITE 2000 7777 BONHOMME AVE. ST. LOUIS, MO 63105	
Defendant/Respondent: RED ROOF INNS, INC	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105	
Nature of Suit: CC Pers Injury-Other		

**Summons in Civil Case**

The State of Missouri to: **RED ROOF INNS, INC**  
Alias:

CSC LAWYERS INC. SERVICE CO  
221 BOLIVAR STREET  
JEFFERSON CITY, MO 65101

**SEP 16 2020**

**JOAN M. GILMER**  
CIRCUIT CLERK, ST. LOUIS COUNTY



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

**SPECIAL NEEDS:** If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.

24-AUG-2020  
Date

*Joan M. Gilmer*  
Clerk

Further Information:  
LES

**Sheriff's or Server's Return**

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.  
 (for service on a corporation) delivering a copy of the summons and a copy of the petition to

CSC lawyers, S.L. (name) designee (title).

other \_\_\_\_\_

Served at 350 E. High (address)  
in Colo (County/City of St. Louis), MO, on 09-01-2020 (date) at 800 AM (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Sherry John P Wheeler By 8/2 Amie Weller

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_

Notary Public

*10/16  
30-*